



## Notice of Service of Process

MDM / ALL  
Transmittal Number: 17924470  
Date Processed: 03/21/2018

**Primary Contact:** Kurt Najork  
Collection Bureau of the Hudson Valley, Inc  
155 North Plank Road  
Newburgh, NY 12550-1747

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<b>Entity:</b>	Collection Bureau of the Hudson Valley, Inc. Entity ID Number 2216608
<b>Entity Served:</b>	Collection Bureau of the Hudson Valley, Inc.
<b>Title of Action:</b>	Elizabeth Matos vs. Collection Bureau of the Hudson Valley, Inc.
<b>Document(s) Type:</b>	Summons/Complaint
<b>Nature of Action:</b>	Violation of State/Federal Act
<b>Court/Agency:</b>	Essex County Superior Court, New Jersey
<b>Case/Reference No:</b>	ESX-DC-004034-18
<b>Jurisdiction Served:</b>	New Jersey
<b>Date Served on CSC:</b>	03/19/2018
<b>Answer or Appearance Due:</b>	04/23/2018
<b>Originally Served On:</b>	CSC
<b>How Served:</b>	Regular Mail
<b>Sender Information:</b>	Louis Joseph Johnson 201-552-6858

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

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Court's Address and Phone Number:  
 ESSEX Special Civil Part  
 50 WEST MARKET STREET  
 NEWARK, NJ 07102-0000  
 973-776-9300

Superior Court of New Jersey  
 Law Division, Special Civil Part  
 ESSEX County  
 Docket No: ESX-DC-004034-18  
 Civil Action  
 CONTRACT DISPUTE

### YOU ARE BEING SUED!

#### Person or Business Suing You (Plaintiff)

ELIZABETH MATOS

See Page 3 for Plaintiff list

#### Plaintiff's Attorney Information

LOUIS JOSEPH JOHNSON  
 LOUIS J. JOHNSON JR., LLC  
 50 HARRISON ST PH-458  
 HOBOKEN, NJ 07030-0000  
 201-552-6858

#### Person or Business Being Sued (Defendant)

COLLECTION BUREAU OF THE HUDSON VALLEY, INC., ABC  
 CORPS I-X

See Page 3 for Defendant list

#### The Person or Business Suing You Claims You Owe the Following:

Demand Amount	\$15000.00
Filing Fee	\$75.00
Service Fee	\$7.00
Attorney's Fees	\$2500.00
<b>TOTAL</b>	<b>\$17582.00</b>

### FOR JUDICIARY USE ONLY

In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. **If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement.** If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.

**IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE 04/23/2018, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:**

- 1. Answer the complaint.** An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Offices or on the Judiciary's Internet site [njcourts.gov](http://njcourts.gov) under the section for Forms. If you decide to file an answer to the complaint made against you:
  - Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: *Treasurer, State of New Jersey*. Include **ESX-DC-004034-18** (your Docket Number) on the check.
  - Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above.
  - Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This **MUST** be done at the same time you file your Answer with the court on or before **04/23/2018**.
- 2. Resolve the dispute.** Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the **SIGNED** agreement to the court's address listed above on or before **04/23/2018**.


**Please Note - You may wish to get an attorney to represent you.** If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at 973-624-4500. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at 973-622-6204. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.

/s/ Michelle M. Smith


Clerk of the Superior Court



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 <p>Dirección y teléfono del tribunal          Parte Civil Especial de ESSEX          50 WEST MARKET STREET          NEWARK, NJ 07102-0000          973-776-9300</p>	<p><b>El Tribunal Superior de Nueva Jersey</b>  <b>División de Derecho, Parte Civil Especial</b>          Condado de ESSEX          Número del expediente <b>ESX-DC-004034-18</b>  <b>Demanda de Acción Civil</b>  <b>NOTIFICACIÓN DE DEMANDA</b>  <b>CONTRACT DISPUTE</b></p>										
<b>¡LE ESTÁN DEMANDANDO!</b>											
<p><b>Persona o entidad comercial que le está demandando (el demandante)</b>          ELIZABETH MATOS</p> <p>See Page 3 for Plaintiff list</p> <p><b>Información sobre el abogado del demandante</b>          LOUIS JOSEPH JOHNSON          LOUIS J. JOHNSON JR., LLC          50 HARRISON ST PH-458          HOBOKEN, NJ 07030-0000          201-552-6858</p>	<p><b>Persona o comercial ser demandada (el demandado)</b>          COLLECTION BUREAU OF THE HUDSON VALLEY, INC., ABC          CORPS I-X          See Page 3 for Defendant list</p> <p><b>La persona o comercial que le está demandando afirma que usted le debe lo siguiente:</b></p> <table border="0"> <tr> <td>Cantidad a la vista</td> <td style="text-align: right;">\$15000.00</td> </tr> <tr> <td>Tasa judicial</td> <td style="text-align: right;">\$75.00</td> </tr> <tr> <td>Cargo del emplazamiento</td> <td style="text-align: right;">\$7.00</td> </tr> <tr> <td>Honorarios del abogado</td> <td style="text-align: right;">\$2500.00</td> </tr> <tr> <td><b>TOTAL</b></td> <td style="text-align: right;"><b>\$17582.00</b></td> </tr> </table>	Cantidad a la vista	\$15000.00	Tasa judicial	\$75.00	Cargo del emplazamiento	\$7.00	Honorarios del abogado	\$2500.00	<b>TOTAL</b>	<b>\$17582.00</b>
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Honorarios del abogado	\$2500.00										
<b>TOTAL</b>	<b>\$17582.00</b>										
<b>PARA USO EXCLUSIVO DEL PODER JUDICIAL</b>											
<p>En la demanda adjunta la persona o entidad comercial que le esta demandando le informa brevemente al juez su versión de los hechos de la causa y la suma de dinero que afirma que usted le debe. <b>Si usted no responde a la demanda puede perder la causa automáticamente y el juez puede dar al demandante lo que está pidiendo más intereses y los costos legales. Usted tiene 35 días a partir de la fecha del emplazamiento para presentar su respuesta o un acuerdo firmado.</b> Si se dicta un fallo en su contra, un Oficial de la Parte Civil Especial puede embargar su dinero, sueldo o sus bienes muebles (personales) para pagar todo el fallo o una parte del mismo. El fallo es válido por 20 años.</p>											
<p><b><u>SI USTED NO ESTÁ DE ACUERDO CON LAS ALEGACIONES DEL DEMANDANTE, EL TRIBUNAL TIENE QUE RECIBIR UNA RESPUESTA POR ESCRITO O UN ACUERDO FIRMADO PARA EL 04/23/2018 O ANTES DE ESA FECHA, O EL JUEZ PUEDE EMITIR UN FALLO EN SU CONTRA. SI USTED NO ESTÁ DE ACUERDO CON EL DEMANDANTE, DEBE HACER UNA DE LAS SIGUIENTES COSAS O LAS DOS:</u></b></p>											
<ol style="list-style-type: none"> <li><b>1. Responder a la demanda.</b> Un formulario de respuesta que le explicará cómo responder a la demanda está disponible en cualquiera de las Oficinas de la Parte Civil Especial de Nueva Jersey o en el sitio Internet del Poder Judicial <a href="http://njcourts.gov">njcourts.gov</a> bajo la sección de formularios (Forms). Si usted decide presentar una respuesta a la demanda que se hizo en su contra:             <ul style="list-style-type: none"> <li>• Llene el formulario de Respuesta Y pague la tasa judicial de presentación que corresponda mediante un cheque o giro bancario o postal acreditable al: "<b>Treasurer, State of New Jersey</b>" (Tesorero del Estado de Nueva Jersey). Incluya <b>ESX-DC-004034-18</b> (el número de su expediente) en el cheque.</li> <li>• Envíe por correo el formulario de Respuesta llenado y el cheque o giro bancario o postal a la dirección del tribunal que figura más arriba, o entréguelos personalmente en dicha dirección.</li> <li>• Entregue personalmente o envíe por correo común una copia del formulario de Respuesta llenado al abogado del demandante. Si el demandante no tiene abogado, envíe su formulario de respuesta llenado al demandante por correo común y por correo certificado. Esto SE TIENE que hacer al mismo tiempo que presente su Respuesta al tribunal a más tardar el <b>04/23/2018</b>.</li> </ul> </li> <li><b>2. Resolver la disputa.</b> Comuníquese con el abogado del demandante, o con el demandante si éste no tiene abogado, para resolver esta disputa. El demandante puede estar de acuerdo con aceptar arreglos de pago. <b>Si llegara a un acuerdo, envíe por correo o entregar personalmente el acuerdo FIRMADO</b> a la dirección del tribunal que figura más arriba, o entréguelo personalmente en dicha dirección a más tardar el <b>04/23/2018</b>.</li> </ol>											
<p><b>Nota - Puede que usted quiera conseguir que un abogado para que lo represente.</b> Si usted no puede pagar a un abogado, podría obtener consejos legales gratuitos si se comunica con Legal Services (Servicios Legales) llamando al 973-624-4500. Si usted puede pagar a un abogado, pero no conoce a ninguno, puede llamar al Lawyer Referral Services (Servicios de Recomendación de Abogados) del Colegio de Abogados (Bar Association) de su condado local al 973-622-6204. Notifique al tribunal ahora si usted necesita un intérprete o un arreglo por una discapacidad para cualquier comparecencia futura en el tribunal.</p>											
<p style="text-align: right;">/s/ Michelle M. Smith          Subsecretario(a) del Tribunal Superior</p>											

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 <p>Court's Address and Phone Number: ESSEX Special Civil Part 50 WEST MARKET STREET NEWARK, NJ 07102-0000</p> <p>973-776-9300</p>	<p>Superior Court of New Jersey Law Division, Special Civil Part ESSEX County Docket No: <b>ESX-DC-004034-18</b></p> <p><b>Civil Action</b> <b>SUMMONS</b> <b>CONTRACT DISPUTE</b></p>
<p><u>Additional Plaintiffs/demandantes adicionales</u></p>	<p><u>Additional Defendants/demandados adicionales</u> ABC CORPS I-X</p>



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Louis J. Johnson Jr. Attny. ID# 209332017  
50 Harrison Street, PH-458  
Hoboken, New Jersey 07030  
Tel: (201) 552-6858 / Fax: (201) 552-6857  
*Attorney for Plaintiff Elizabeth Matos*

ELIZABETH MATOS,

Plaintiff,

Vs.

COLLECTION BUREAU OF THE  
HUDSON VALLEY, INC.; ABC  
CORPS I-X,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: SPECIAL CIVIL PART  
ESSEX COUNTY

DOCKET NO.: DC-

Civil Action

**VERIFIED COMPLAINT WITH JURY  
DEMAND**

Plaintiff Elizabeth Matos, by way of Verified Complaint,  
alleges:

**JURISDICTION AND VENUE**

1. Plaintiff brings this action under New Jersey consumer protection statutes and Federal law to obtain civil money penalties and other relief for Defendants' violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. ("FDCPA"), and Truth-in-Consumer Contract Warranty and Notice Act ("TCCWNA"), N.J.S.A. §56:12-14 to -18 in its illegal efforts to collect an alleged consumer debt from Plaintiff.

2. Jurisdiction of this Court arises pursuant to 15 U.S.C. §1692k(d) and the amount in controversy does not exceed \$15,000.00.



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3. Venue in this County is proper because the events giving rise to the claims occurred substantially within the State of New Jersey, Essex County, Plaintiff resides here, and Defendants transact business here.

4. Defendants have transacted business within the State of New Jersey by attempting to collect this debt from Plaintiff while located within and permanently residing within the State of New Jersey.

#### PARTIES

5. Plaintiff Elizabeth Matos is a natural person who resides in the State of New Jersey with her permanent residence at 207 Pennington Street, Apt. 3B, Newark, New Jersey 07105 and is a "consumer" as that term is defined by 15 U.S.C. §1692a(3).

6. Defendant Collection Bureau of the Hudson Valley, Inc. ("CBHV") is a collection agency operating from addresses which include 155 North Plank Road, Newburgh, New York 12550 and is a "debt collector" as the term is defined by 15 U.S.C. §1692a(6). Defendant maintains an agent for service of process at CORPORATION SERVICE COMPANY, PRINCETON SOUTH CORPORATE CTR STE 160, 100 CHARLES EWING BLVD, EWING, NJ, 08628.

1. ABC CORPS I-X are presently unknown parties, persons or business entities, or are owners/members/officers of any or all of the named and unnamed business entities against whom Plaintiff is entitled to relief. Such people will be identified and named in

successive Amended Complaints as soon as possible.

FACTUAL ALLEGATIONS

2. On or about October 15, 2017, Plaintiff received a monthly billing statement from Optimum for television, internet and telephone services in the amount of \$516.37. Plaintiff requested an accounting behind said amount, was unable to resolve the issue with Optimum and eventually switched to a more affordable service provider.

3. Upon information and belief, Optimum sent the subject account to CBHV for collections on November 1, 2017.

4. Per Defendant CBHV's attempt to validate the subject debt via the correspondence annexed hereto as **Exhibit 1**, by November 15, 2017, Optimum claimed only \$103.71 was past due and \$188.44 would become due on November 22, 2017.

5. Thereafter, Plaintiff has received repeated and persistent phone calls from Defendant CBHV in an attempt to collect the alleged debt.

6. By way of example, on January 31, 2018 at or around 12:34 p.m., Defendant CBHV contacted an AT&T cellular telephone held by Plaintiff's sister, Claribel Matos, to attempt to collect the alleged debt. Defendant CBHV made the telephone communication from its known collection number 845-913-7448 to 973-704-0035.



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Upon information and belief, the following represents the contents of the communication:

- Consumer: Hello
  - (Auto-dialer Pause)
- Collector: Hello may I speak with Elizabeth Matos please?
- Consumer: She's not here can I take a message?
- Collector: No message. Do you know when she'll be available?
- Consumer: No I don't.
- Collector: Ok I'll just try back thank you.
- Consumer: Ok.

7. Such communication by the Defendant debt collector in an attempt to collect the subject consumer debt is directly contrary to 1692b(1) and/or 1692d(6) and 1692e(11) as Defendant failed to identify itself by disclosing its identity as a debt collector.

8. Since around October 2017, Plaintiff has received persistent and repeated phone calls and text messages from Optimum then Defendant CBHV in attempt to collect the alleged debt.

9. Defendant contacted Plaintiff by telephone to collect this alleged debt on multiple occasions, each of which were "communications" in attempt to collect a debt as that term is defined by 15 U.S.C. §1692a(2).

10. Upon information and belief, during its collection efforts, Defendant collectors have at times refused to provide the subject account number to verify the validity of any debt owed by Plaintiff.



11. On multiple occasions, Plaintiff has disputed the validity of this debt, refused to pay the alleged debt and demanded Defendant(s) and/or Optimum cease its collection efforts.

12. Each telephone call from Defendant is a communication as that term is defined by 15 U.S.C. §1692a(2) in an attempt to collect an alleged "debt" as that term is defined by 15 U.S.C. §1692a(5), namely, a consumer debt.

13. Upon information, Plaintiff did not provide consent to be contacted via her sister's cellular telephone from this or any of these Defendants.

14. The consumer debt at issue is for personal, family and household purposes.

15. The United States Supreme Court has recognized a citizen's home as "the last citadel of the tired, the weary, and the sick," Gregory v. Chicago, 394 U.S. 111, 125 (1969), and has noted that "[p]reserving the sanctity of the home, the one retreat to which men and women can repair to escape from the tribulations of their daily pursuits, is surely an important value." Carey v. Brown, 447 U.S. 455, 471 (1980).

16. Despite this, Defendants caused Plaintiff's cellular telephone to ring repeatedly on multiple occasions within the past year.

17. Additionally, Defendant's true name per the New York State Department of State Division of Corporations is on



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information and belief "Collection Bureau of the Hudson Valley, Inc." while Defendant attempts to collect debts under aliases including CBHV, Collection Bureau Hudson Valley, Collection Bureau Hudson Valley, Inc., Healthcare Billing Service of NY Inc., CB/HV, Inc., CB/HV, COLLECTION BUREAU OF THE HUDSON VALL, and CLLCN BUREAU OF THE HU which are names other than the true name of the debt collector's business 15 U.S.C. §1692e(14).

18. The communications in an attempt to collect a debt by the Defendant debt collectors were false, deceptive, harassing, oppressive, and abusive collection communications made in violation of numerous and multiple provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692b(1), 1692b(2), 1692c(a)(1), 1692c(a)(3), 1692c(b), 1692d, 1692d(5), 1692d(6), 1692e, 1692e(2) 1692e(8), 1692e(10), 1692e(11), 1692e(14), 1692f, 1692f(1), and 1692g amongst others.

19. All of the above-described collection communications made to Plaintiffs and others by each individual and the other collection agents employed by Defendant CBHV were made in violation of numerous and multiple provisions of the FDCPA, including but not limited to all of the provisions of the FDCPA cited herein, as well as an invasion of their privacy by an intrusion upon seclusion.

20. This series of abusive collection calls by Defendants caused Plaintiff to at times cry and made her physically ill

because of the aggressive manner in which this debt was collected by this Defendant and its principal.

21. Plaintiff has suffered actual damages as a result of these illegal collection communications by these Defendants in the form of anger, anxiety, emotional distress, fear, frustration, upset, humiliation, embarrassment, amongst other negative emotions, as well as suffering from unjustified and abusive invasions of personal privacy.

22. The acts and omissions of these individuals, and the other debt collectors employed as agents by Defendant who communicated with Plaintiff and others as further described herein, were committed within the time and space limits of their agency relationship with their principal, Optimum, a non-party to this action.

23. The acts and omissions by these individuals and these other debt collectors were incidental to, or of the same general nature as, the responsibilities these agents were authorized to perform by Defendant in collecting consumer debts.

24. By committing these acts and omissions against Plaintiff, these individuals and these other debt collectors were motivated to benefit their principal, Defendant CBHV.

25. Defendant is therefore liable to Plaintiff through the Doctrine of Respondeat Superior for the intentional and negligent acts, errors, and omissions done in violation of State and Federal



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law by its collection employees, including but not limited to violations of the FDCPA and New Jersey law, in its attempts to collect this debt from Plaintiff.

CAUSES OF ACTION

COUNT I.

VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT  
15 U.S.C. §1692 ET SEQ.

26. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

27. The foregoing acts and omissions of each Defendant and its agents constitute numerous and multiple violations of the FDCPA including, but not limited to, each and every one of the above-cited provisions of the FDCPA, 15 U.S.C. §1692 et seq., with respect to each Plaintiff.

28. As a result of each Defendants' violations of the FDCPA, each Plaintiff is entitled to actual damages pursuant to 15 U.S.C. §1692k(a)(1); statutory damages in an amount up to \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2)(A); and, reasonable attorney's fees and costs pursuant to 15 U.S.C. §1692k(a)(3), from Defendants herein.

COUNT II.

VIOLATION OF THE TRUTH-IN-CONSUMER CONTRACT, WARRANTY, AND  
NOTICE ACT, N.J.S.A. §56:12-14 et seq.

29. Plaintiff incorporates by reference all of the

paragraphs of this Complaint as though fully stated herein.

30. Plaintiff is a consumer or prospective consumer per N.J.S.A. §56:12-15. Each Defendant is a seller, lessor, creditor, lender or bailee or motivated to benefit the same in the course of his business pursuant to N.J.S.A. §56:12-15.

31. The foregoing acts and omissions of each Defendant and each and every one of its principals and agents constitute numerous and multiple violations of Plaintiff's clearly established legal rights and therefore are each a violation of the Truth-in-Consumer Contract, Warranty and Notice Act, N.J.S.A. §56:12-14 to -18 with respect to each Plaintiff.

32. On or about February 13, 2018, Defendant CBHV gave or displayed to Plaintiff the written consumer Notice which included the following provision:

THIS IS AN ATTEMPT TO COLLECT A DEBT BY A DEBT COLLECTOR  
AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT  
PURPOSE.

[Exhibit 1 at page 2].

33. This provision violated Defendant's clearly established responsibilities per the FDCPA, as the Notice is not conspicuous and is hidden at the very top margin of the second page of the communication contrary to 15 U.S.C. §1692e(11).

34. Defendant CBHV gave or displayed the aforementioned written consumer notice in the course of its debt collection



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business in an attempt to collect a debt by false, misleading and/or deceptive means.

35. As a result of each of the Defendants' violations of State and Federal law, each Plaintiff is entitled to statutory and actual damages, attorney's fees and court costs and equitable relief as contemplated by the applicable statute.

COUNT III.  
INVASION OF PRIVACY BY INTRUSION UPON SECLUSION

36. Plaintiff incorporates by reference all of the paragraphs of this Complaint as though fully stated herein.

37. Congress explicitly recognized a consumer's inherent right to privacy in collection matters in passing the Fair Debt Collection Practices Act, when it stated as part of its findings:

Abusive debt collection practices contribute to the number of personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of individual privacy.

15 U.S.C. §1692(a) (emphasis added).

38. Congress further recognized a consumer's right to privacy in financial data in passing the Gramm Leach Bliley Act, which regulates the privacy of consumer financial data for a broad range of "financial institutions" including debt collectors albeit without a private right of action, when it stated as part of its purposes:

It is the policy of the Congress that each financial institution has an affirmative and continuing obligation to respect the privacy of its customers and to protect the security and confidentiality of those customers' nonpublic personal information.

15 U.S.C. §6801(a) (emphasis added).

39. Each Defendant and/or its agents intentionally and/or negligently interfered, physically or otherwise, with the solitude, seclusion and or private concerns or affairs of these Plaintiff(s), namely, by unlawfully attempting to collect a debt from them and disclosing the private financial information, and thereby invaded Plaintiff's privacy.

40. Each Defendant and its agents intentionally and/or negligently caused emotional harm to Plaintiff by engaging in highly offensive conduct in the course of collecting this debt, thereby invading and intruding upon Plaintiff's right to privacy.

41. Plaintiffs had a reasonable expectation of privacy in Plaintiff's solitude, seclusion, private concerns or affairs.

42. The conduct of each Defendant and their agents, in engaging in the above-described illegal collection conduct against Plaintiff, resulted in multiple intrusions and invasions of privacy by Defendants which occurred in a way that would be highly offensive to a reasonable person in that position.

43. As a result of such intrusions and invasions of privacy, Plaintiff(s) are entitled to actual damages in an amount to be determined at trial from each Defendant.



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PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that judgment be entered against each and every Defendant:

COUNT I.  
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT  
15 U.S.C. §1692 ET SEQ.

- For an award of actual damages pursuant to 15 U.S.C. §1692k(a)(1) against each Defendant and for each Plaintiff;
- For an award of statutory damages of \$1,000.00 pursuant to 15 U.S.C. §1692k(a)(2)(A) against each Defendant and for each Plaintiff;
- For an award of costs of litigation and reasonable attorney's fees pursuant to 15 U.S.C. §1692k(a)(3) against each Defendant and for each Plaintiff.

COUNT II.  
VIOLATIONS OF THE TRUTH-IN-CONSUMER CONTRACT, WARRANTY, AND  
NOTICE ACT, N.J.S.A. §56:12-14 ET SEQ.

- For an award of actual damages from each Defendant for the emotional distress suffered as a result of the intentional and/or negligent FDCPA violations and intentional and/or negligent invasions of privacy in an amount to be determined at trial and for each Plaintiff; and
- Termination of the contracts pursuant to N.J.S.A.



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§56:12-17; and

- For an award of not less than \$100.00 per violation pursuant to N.J.S.A. §56:12-17; and
- For such other and further relief as may be just and proper.

COUNT III.

INVASION OF PRIVACY BY INTRUSION UPON SECLUSION

- For an award of actual damages from each Defendant for the emotional distress suffered as a result of the intentional and/or negligent FDCPA violations and intentional and/or negligent invasions of privacy in an amount to be determined at trial and for each Plaintiff; and
- For such other and further relief as may be just and proper.

THE LAW OFFICE OF  
LOUIS J. JOHNSON JR., L.L.C.  
*Attorney for Plaintiff*  
*Elizabeth Matos*

Dated: 03/09/2018

/s/ Louis J. Johnson Jr.  
Louis J. Johnson Jr.  
ljohnson@louisjohnsonlaw.com  
50 Harrison Street, PH-458  
Hoboken, New Jersey 07030  
Tel: (201) 552-6858  
Fax: (201) 552-6857



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DESIGNATION OF TRIAL COUNSEL

Plaintiff hereby designates Louis J. Johnson Jr., Esq. as trial counsel on the action herein pursuant to the New Jersey Rules of Court.

CERTIFICATION PURSUANT TO R. 4:5-1(b)(2)

Plaintiff hereby certifies that there are not any other pending actions in any other court or arbitration, no other such proceedings are presently contemplated and there are no other non-parties who should be joined with this action at this time.

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(c)

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

JURY TRIAL DEMAND

Plaintiff hereby demands a trial by jury.

THE LAW OFFICE OF  
LOUIS J. JOHNSON JR., L.L.C.  
*Attorney for Plaintiff*  
*Elizabeth Matos*

Dated: 03/09/2018

/s/ Louis J. Johnson Jr.  
Louis J. Johnson Jr.  
ljohnson@louisjohnsonlaw.com  
50 Harrison Street, PH-458  
Hoboken, New Jersey 07030  
Tel: (201) 552-6858  
Fax: (201) 552-6857

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Louis J. Johnson Jr. Attny. ID# 209332017  
50 Harrison Street, PH-458  
Hoboken, New Jersey 07030  
Tel: (201) 552-6858 / Fax: (201) 552-6857  
*Attorney for Plaintiff Elizabeth Matos*

ELIZABETH MATOS,

Plaintiff,

Vs.

COLLECTION BUREAU OF THE  
HUDSON VALLEY, INC.; ABC  
CORPS I-X,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: SPECIAL CIVIL PART  
ESSEX COUNTY

DOCKET NO.: DC-

Civil Action

**VERIFICATION TO COMPLAINT**

I, Elizabeth Matos, by way of Verification in lieu of Affidavit herein state:

1. I am fully familiar with the facts and circumstances which pertain to this action.

2. I have reviewed the Verified Complaint and Jury Demand which shall be filed in the Essex County Law Division, Special Civil Part, of the Superior Court of New Jersey..

3. The facts alleged in the Verified Complaint are true to the best of my knowledge and understanding.

4. Annexed hereto as **Exhibit 1** is a copy of a communication from Defendant CBHV dated February 13, 2018.

5. This entire situation has been extremely difficult to bear and has caused unnecessary controversy amongst the members of my family.



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6. I certify that the foregoing statements made by me are true; I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 03/08/18

  
Elizabeth Matos

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# EXHIBIT 1

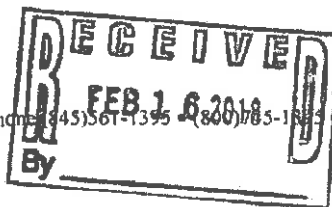


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Collection Bureau Hudson Valley, Inc

P.O. Box 831 • 155 North Plank Road • Newburgh, NY 12550-0831 • Phone (845) 561-1395 • (800) 785-1345 • Fax (845) 913-7403



ELIZABET MATOS  
C/O LAW OFFICE OF LOUIS JOHNSON  
50 HARRISON ST STE PH-458  
HOBOKEN, NJ 07030-6064

Date: 02/13/18

Creditor: OPTIMUM.  
CBHV Reference #: [REDACTED] 3220  
Balance: \$293.15

To Whom It May Concern:

Enclosed is your final bill from Optimum.

Payment can be made by check, check by phone, money order, credit card, debit card or by visiting our website at [www.cbhv.com/make-online-payment](http://www.cbhv.com/make-online-payment).

To mail a payment, please send to:  
CBHV  
PO Box 831  
Newburgh, NY 12551-0831

Please write your CBHV Reference # on your check.

For inquiries or to make a payment by phone, please call:

Mr. Stewart (888) 913-7489  
Collection Representative

Thank you for your attention to this matter.

See reverse side for important information concerning your rights.

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**THIS IS AN ATTEMPT TO COLLECT A DEBT BY A DEBT COLLECTOR AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

**Collection Bureau of the Hudson Valley, Inc. - Address and Office Hours (Eastern Time):**

PO Box 831 • 155 North Plank Road, Newburgh, NY 12550

Monday through Thursday: 8:30 AM – 9:00 PM • Friday: 8:30 AM – 5:00 PM • Saturday: 8:30 AM – 12:30 PM

Colorado Office: 27 North Willerup Avenue, Suite B, Montrose, CO 81401 • (970) 249-7514

CBHV's hospital clients may have financial assistance programs. If you feel you may qualify for these programs please call our collection specialists at (888) 913-7499.

**We are required under state law to notify consumers of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.**

**MASSACHUSETTS**

NOTICE OF IMPORTANT RIGHTS - You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

**NEW YORK CITY**

New York City Department of Consumer Affairs License Number: 0905924

**NORTH CAROLINA**

North Carolina permit number 3668

**TENNESSEE**

This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance.

**IF ANY OF THE FOLLOWING HAS CHANGED, PLEASE INDICATE AND RETURN:**

Your name: \_\_\_\_\_ Home Phone \_\_\_\_\_

Street: \_\_\_\_\_ Business Phone \_\_\_\_\_

City: \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Employer \_\_\_\_\_

**Method of Payment (check one)**

Check Enclosed \_\_\_\_\_ Visa \_\_\_\_\_

MasterCard \_\_\_\_\_

Acct # \_\_\_\_\_

Expiration Date: \_\_\_\_/\_\_\_\_

Charge Amount: \_\_\_\_\_

Signature \_\_\_\_\_

Insurance Co. \_\_\_\_\_

Address \_\_\_\_\_

Group # \_\_\_\_\_ ID# \_\_\_\_\_

Effective Date: \_\_\_\_\_

Subscriber: \_\_\_\_\_

Subscriber SS#: \_\_\_\_\_

